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**MCDERMOTT, WILL & EMERY**

March 15, 2001

**BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

EPA Region 5 Records Ctr.



265451

Michael C. Partee  
Assistant Attorney General  
Environmental Bureau  
188 West Randolph Street  
Suite 2001  
Chicago, Illinois 60601

Re: Response of Rexnord Corporation to Subpoena *Duces Tecum* Issued  
In the Matter of People v. The Lockformer Company, Case No. 00 CH  
62 (DuPage County)

Dear Mr. Partee:

Enclosed are the documents produced by Rexnord Corporation in response to the referenced subpoena *duces tecum*. The documents are bates numbered 1-133.

We understand from you that the Attorney General issued subpoenas to Rexnord and other companies identified by the defendant as potentially responsible parties for the groundwater contamination being addressed in the referenced litigation. We further understand that the defendant did not provide any basis for why they identified Rexnord as responsible for groundwater contamination in Lisle.

In fact, there is absolutely no basis for any allegation by Lockformer with regard to Rexnord. Rexnord, to its knowledge, has never had a release of chlorinated solvents from its Downers Grove facility. The only chlorinated solvent use at the facility consists of a small amount of solvent used in a small, totally enclosed vapor degreaser, purchased by the facility in 1989 for the purpose of cleaning partially assembled bearings. The facility used 1,1,1 trichloroethane in the degreaser from 1989 until mid-1993, and then has used trichloroethylene from 1993 until the present.

The following documents are enclosed:

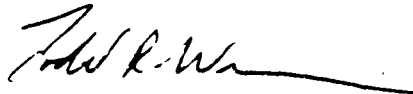
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- Uniform Hazardous Waste Manifests for waste trichloroethylene and waste 1,1,1 trichloroethane
- Laboratory analysis reports for characterization of waste trichloroethylene (records exist back to 1996)
- Trichloroethylene usage records kept pursuant to FESOP Permit I.D. No. 043030AAU
- Purchasing records for trichloroethylene (records date back to August 1994)
- Form GM-Generation and Management for trichloroethylene and 1,1,1, trichloroethane from the Annual Hazardous Waste Reports.

As the documents show, all waste chlorinated solvents from the small vapor degreaser were recovered or reclaimed by the various suppliers. The documents also evidence the small scale of the vapor degreaser operation. Please note that the total amount of chlorinated solvent purchased averages approximately four drums per year, while waste chlorinated solvent has averaged approximately two drums per year, with the balance of the material represented by permitted air emissions.

As the enclosed documents in this letter make clear, Rexnord does not have any connection to the environmental issues being addressed by the State of Illinois in the Lockformer litigation. Please call me if you have any further questions.

Sincerely yours,



Todd R. Wiener

TRW:ji  
Enclosure

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bcc: Irwin M. Shur, Esq. (Vice President and Division General Counsel)  
Mr. Rudolph A. Fuys, Jr., Ph.D., CHMM  
Robert E. Bouma, Esq.